

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

NO. 3:16-CR-516-JJZ

v.

Filed Under Seal

ALAN ANDREW BEAUCHAMP (01)
WADE NEAL BARKER (03)
WILTON MCPHERSON BURT (04)
JACKSON JACOB (08)
DOUGLAS SUNG WON (09)
MICHAEL BASSEM RIMLAWI (10)
DAVID DAESUNG KIM (11)
SHAWN MARK HENRY (13)
MRUGESHKUMAR KUMAR SHAH (14)
FRANK GONZALES JR. (16)
ISRAEL ORTIZ (17)
IRIS KATHLEEN FORREST (18)

GOVERNMENT’S SENTENCING WITNESS LIST

In its November 16, 2020 order, (dkt. 1576), the Court ordered the government to respond prior to sentencing to numerous filings from the remaining defendants concerning objections to the Presentence Reports or arguments in mitigation. The government has responded to several of those filings and continues to diligently work through the remaining documents. To the extent the remaining filings raise factual issues, the government will attempt to address those issues with trial testimony or exhibits, the broader discovery in the case, or an affidavit from an agent. If it is unable to do so, the government designates **Special Agent David Keagy** as its sole witness for sentencing. The government anticipates any testimony from Agent Keagy being discrete

and driven largely by any questions that the Court cannot resolve after reviewing the government's written responses.

Respectfully submitted,

ERIN NEALY COX
United States Attorney

/s/ Andrew Wirmani
Andrew O. Wirmani
Assistant United States Attorney
Texas Bar No. 24052287
1100 Commerce Street, Third Floor
Dallas, Texas 75242
Telephone: 214.659.8681
Facsimile: 214.767.4100

CERTIFICATE OF SERVICE

I hereby certify that on **December 10, 2020**, I electronically filed the foregoing document with the Clerk of Court for the United States District Court, Northern District of Texas, using the electronic case filing system of the Court. The electronic case filing system sent a "Notice of Electronic Filing" to all attorneys who have consented in writing to accept this Notice as service of this document.

/s/ Andrew Wirmani
Andrew O. Wirmani
Assistant United States Attorney